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April 28, 2005

Honorable James H. Welsh Commissioner of Conservation Department of Natural Resources Office of Conservation P. O. Box 94275 Baton Rouge, Louisiana 70804-9275

RE: Proposed Substitute Unit Wells

FT Sand, Reservoir A (Exceptional Location)

FV Sand, Reservoir A

IOWA FIELD

Jefferson Davis Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Greystone Operating, Inc., for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the FT Sand, Reservoir A, and the FV Sand, Reservoir A, in the lowa Field, Jefferson Davis Parish, Louisiana, for which units were established and rules and regulations adopted by Office of Conservation Order No. 39-E, effective August 1, 1954 and Order No. 39-B-A, effective August 1, 1954 respectively.

FOR THE FT SAND, RESERVOIR A (ORDER NO. 39-E)

- 1. To authorize and permit Greystone Operating, Inc. to designate their Denison No. 1 Well (SN 227504) as a substitute unit well for the ES WILLETT FT SD UNIT, at an exceptional location as shown on the plat which is attached hereto and a made a part hereof.
- 2. Except as may be in conflict with the provisions hereof, the provisions of Office of Conservation Order No. 39-E, effective August 1, 1954, shall remain in full force and effect.
 - 3. To consider such other matters as may be pertinent to this application.

The Amoco - E.S. Willett No. 2 (SN 025783), the present unit well, ceased to produce from the FT Sand and was plugged and abandoned on December 13, 1962, therefore, the proposed substitute unit well is necessary to recover hydrocarbons within the existing unit which would otherwise be lost.

The FT Sand, Reservoir A, in the Iowa Field, Jefferson Davis Parish, Louisiana, was previously defined in Office of Conservation Order No. 39-E, effective August 1, 1954.

FOR THE FV SAND, RESERVOIR A (ORDER NO. 39-B-A)

- 1. To authorize and permit Greystone Operating, Inc. to designate their Denison No. 2 Well (SN 230334) as a substitute unit well for the FV RA SUA, at the location shown on the plat which is attached hereto and made a part hereof.
- 2. Except as may be in conflict with the provisions hereof, the provisions of Office of Conservation Order No. 39-B-A, effective August 1, 1954, shall remain in full force and effect.
 - 3. To consider such other matters as may be pertinent to this application.

The Energy Reserves Group - E.S. Willett No. 4 (SN 044636), the present unit well, ceased to produce from the FV Sand in October, 1987 and was plugged and abandoned on February 12, 1988, therefore, the proposed substitute unit well is necessary to recover hydrocarbons within the existing unit which would otherwise be lost.

The FV Sand, Reservoir A, in the lowa Field, Jefferson Davis Parish, Louisiana, was previously defined in Office of Conservation Order No. 39-B, effective June 14, 1951.

There are attached hereto and made a part hereof plats identifying the subject units created by Conservation Order Nos. 39-E and 39-B-A, along with the location of the proposed substitute unit well. Pursuant to the Revised Rules of Procedure, a list of names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list will be provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure.

Finally, there is enclosed our check on behalf of the applicant, Greystone Operating, Inc., in the sum of \$1,510.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES

Bill McAlister

BM/cu Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Road
Brandywine III, Suite 220
Lafayette, Louisiana 70508-4284

Interested Parties, Interested Owners and Represented Parties



